

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

**Cung Le, Nathan Quarry, Jon Fitch, on behalf of  
themselves and all others similarly situated,**

**Plaintiffs,**

**v.**

**Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,**

**Defendant.**

Case No. 5:14-cv-05484-EJD  
5:14-cv-05591-EJD  
5:14-cv-05621-EJD

**[PROPOSED] ORDER APPOINTING  
INTERIM CO-LEAD COUNSEL**

**Luis Javier Vazquez and Dennis Lloyd Hallman,  
on behalf of themselves and all others similarly  
situated,**

**Plaintiffs,**

**v.**

**Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,**

**Defendant.**

**Brandon Vera and Pablo Garza, on behalf of  
themselves and all others similarly situated,**

**Plaintiffs,**

**v.**

**Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,**

**Defendant.**

5:14-cv-05484-EJD  
5:14-cv-05591-EJD  
5:14-cv-05621-EJD

1           1.       Pursuant to Federal Rule of Civil Procedure 23(g)(3), the Court hereby appoints the  
 2 following counsel as Plaintiffs' Interim Co-Lead Class Counsel: Berger & Montague, P.C.; Cohen  
 3 Milstein Sellers & Toll PLLC; and the Joseph Saveri Law Firm, Inc.

4           2.       Plaintiffs' Interim Co-Lead Class Counsel shall be responsible for performing work to  
 5 advance the litigation for the common benefit of all plaintiffs and proposed class members, including all  
 6 plaintiffs and proposed class members in related actions subsequently filed in or transferred to this  
 7 District (collectively, "Plaintiffs"). Plaintiffs' Interim Co-Lead Class Counsel's responsibilities for  
 8 coordinating and organizing Plaintiffs in the conduct of this litigation shall include:

9               a.       Organizing and conducting pretrial law and motion practice, including class  
 10 certification;

11              b.       Organizing and conducting discovery, including the conduct of all discovery on  
 12 behalf of Plaintiffs consistent with Fed. R. Civ. Pro 26;

13              c.       Acting as spokesperson at pretrial conferences;

14              d.       Entering into stipulations with opposing counsel, as necessary, for the conduct of  
 15 litigation;

16              e.       Consulting with and retaining experts, as necessary;

17              f.       Conducting trial and post-trial proceedings;

18              g.       Acting as spokesperson at pretrial conferences;

19              h.       Entering into stipulations with opposing counsel, as necessary, for the conduct of  
 20 the litigation;

21              i.       Encouraging cooperation and efficiency among all Plaintiffs' counsel;

22              j.       Calling meetings of Plaintiffs' counsel, when appropriate;

23              k.       Making all work assignments to Plaintiffs' counsel;

24              l.       Monitoring the activities of all Plaintiffs' counsel to ensure that the litigation is  
 25 conducted effectively, efficiently, and economically;

26              m.       Ensuring that schedules are met, and that unnecessary, duplicative, or  
 27 unproductive expenditures of time and expense are avoided;

28              n.       Negotiating with defense counsel with respect to settlement and other matters, if

1 and as appropriate; and

2 o. In the event of settlement or judgment in Plaintiffs' favor, applying to the Court for,  
3 *inter alia*, attorneys' fees and reimbursement of costs, and allocating any fees and costs awarded by  
4 the Court to Plaintiffs' co-counsel.

5 4. Plaintiffs' Interim Co-Lead Counsel shall also be the contact between plaintiffs' counsel  
6 and counsel for the Defendant, as well as the spokespersons for plaintiffs' counsel, including plaintiffs'  
7 counsel in related actions subsequently filed in or transferred to this District.

8 5. No motion, request for discovery, or other pretrial proceedings shall be initiated or filed by  
9 any Plaintiff except through Interim Co-Lead Counsel.

10 **IT IS SO ORDERED.**

11 Dated:

\_\_\_\_\_  
HON. EDWARD J. DAVILA  
United States District Judge